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Massachusetts Board of Bar Overseers
99 High Street
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Date: 01/22/2025

Attorney Grievance Committee
United States Bankruptcy Court
District of Massachusetts
Donohue Federal Building
595 Main Street
Worcester, MA 01608

Subject: Complaint Regarding Professional Misconduct of Attorney James P. Ehrhard

Dear Attorney Grievance Committee,

I am submitting this complaint to bring to your attention the unprofessional conduct of Attorney James P. Ehrhard during a hearing on January 21, 2025, in Case No.: 24-40897-CJP (Adversary Proceeding No.: 24-04036-CJP). His actions during this hearing were inappropriate, unsubstantiated, and damaging to the integrity of the proceedings.

Details of Misconduct

1. False and Baseless Allegations:
Mr. Ehrhard falsely stated during the hearing that I filed a complaint in Texas against his client, Dr. Sonika Randev. This claim is entirely untrue, and no evidence was provided to support it. Such a baseless statement violates ethical obligations under Rule 3.3 of the Massachusetts Rules of Professional Conduct (Candor Toward the Tribunal).
2. Unprofessional Tone and Mischaracterizations:
Mr. Ehrhard repeatedly referred to a patient in a separate legal matter as "my friend," suggesting a personal relationship intended to undermine my credibility. This was not only irrelevant but also a blatant attempt to distract from the substantive issues at hand.
3. Theatrical Conduct and Third-Party Reliance:
Mr. Ehrhard's dramatic and theatrical approach, combined with his admission of reliance

on unverified information from attorneys in New York, raises concerns about his adherence to Rule 8.4 (Misconduct) regarding dishonesty and misrepresentation.

Impact on Proceedings

The baseless allegations and unprofessional conduct exhibited by Mr. Ehrhard risk prejudicing the court against me and undermining my ability to pursue justice. As a practicing physician, my professional reputation is critical, and such actions cause undue harm.

Request for Investigation

I respectfully request that the Attorney Grievance Committee investigate Mr. Ehrhard's conduct during the hearing and determine whether disciplinary measures are warranted to address this behavior.

Thank you for considering this matter and for your commitment to maintaining ethical standards in the legal profession.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Karan Johar', with a stylized flourish at the end.

Karan Johar, M.D.